NEGATIVE DECLARATION

Department of Toxic Substances Control
Standardized Permitting and Corrective Action Branch
8800 Cal Center drive
Sacramento, California 95826-3200

Subject: ☐ DRAFT ☒ FINAL ☐ MITIGATED

Project Title: Treatment/Storage/Disposal Facility Closure (Phase I), Romic Environmental Technologies Corporation

State Clearinghouse No: 2008042125

Project Location: 2081 Bay Road, East Palo Alto, California, 94303

County: San Mateo

Project Description:
The Department of Toxic Substances Control (DTSC) is considering approval of a Closure Plan (CP) of a Treatment Storage and Disposal Facility owned by Romic Environmental Technologies Corporation (Romic) in East Palo Alto, (Environmental Protection Agency identification number CAD009452657). The CP includes procedures to be used in decontamination, disassembly and disposal of all of the above-ground equipment and structures at the Romic facility. This CP was prepared and submitted following guidelines contained in California Code of Regulations, title 22, section 66264.112. The CP is incorporated by reference.

The Romic facility is located on an irregularly shaped site of approximately 14 acres that connects to Bay Road within the City of East Palo Alto. Hazardous waste operations at the facility were conducted primarily in the central portion of the Facility, which included warehouses for storing and handling containerized waste, tank farms, distillation processing equipment, a fuel blending operations area, and a field services chemical warehouse.

The wastewater treatment plant is located on the south central portion of the property. The administration, laboratory, maintenance buildings, and parking lots are also located on the southern portion of the property. The site is paved with concrete with a narrow strip of unpaved area along the perimeter.

A paved driveway that is approximately 480 feet in length provides access to the site from Bay Road. The site is paved throughout, except for a narrow strip of unpaved area along the perimeter and a gravel parking area near the Bay Road entrance. The site is sloped to capture drainage and is underlain by a system of drains and sumps.

The above-ground hazardous waste management units scheduled for decontamination, disassembly and disposal are located primarily in the following areas of the Facility:

Process and Production Area
The Process Area is located in the central portion of the Facility and contains Tank Farms A, B, CLR, D, G, H, I, J, MNO, and Q. These tank farms are where both raw materials (unprocessed hazardous waste) and processed materials (treated hazardous waste) were stored in 55 gallon drums and totes. The Production Area is located down the center of the tank farms. The equipment for the recycling of solvents, such as distillation columns, vacuum pots, and thin film evaporators, are located in this area.

Tank and process vessel systems to be decontaminated and disposed include waste storage and treatment tanks and tank-like waste treatment process vessels. Romic stored and treated waste in several tank systems with various tank configurations, constructed of materials compatible with the wastes stored. DTSC-regulated and -unregulated tanks and process vessels currently at the Romic Facility are described below.

1. Cone-Bottom Tanks: Carbon steel tanks that would allow the primary settling and separation of sludges in the tanks.
2. Slope-Bottom Tanks: The sloped bottom design facilitates complete removal of waste from the tank, primarily used for storage.
3. Dished Tanks: Used in two main process areas – the fuel blending operation and the hazardous waste treatment equipment associated with distillation operations.
4. Flat-Bottom Tanks: Used primarily for industrial wastewater treatment.

5. Plastic Tanks: Flat-bottomed tanks made from cross-linked and linear-linked high-density polyethylene (HDPE).
6. Lined Tanks: Used for corrosive wastes and lined either with epoxy coating or with rubber.
7. Neutralization Portable Tanks: Used to handle corrosive hazardous wastes and made of cross-linked high density polyethylene.
8. Fractionators: Upright cylindrical vessels.
9. Thin Film Evaporators: Vessels with a motorized wipe assembly
10. Vacuum Pots: Dished or cone-bottomed vessels with internal heating coils.

The tanks and process vessels are located within identified containment areas and are bounded by concrete berms or walls. Each containment area is large enough to hold the accumulation of a 25-year, 24-hour rain event, plus either the contents of the largest tank or 10 percent of the total capacity of all tanks in the containment area. There is also a 500,000-gallon rainwater tank used for the collection of site rainwater.

Storage Buildings
These areas were used to store hazardous wastes that would be processed onsite as well as to store hazardous wastes to be transported offsite for processing. The storage buildings are corrugated metal structures that are open on one, two or three sides, with passive secondary containment systems. The configurations of these structures provide shelter from sun and rain, access for control of fires and spills, and adequate ventilation.

The container storage areas are designed to contain hazardous waste and other hazardous materials in containers such as drums, sacks, tri-wall boxes, and totes. Each storage area also has secondary containment areas that have been equipped with a sprinkler system.

Two Drum Crushers are located in the North Storage Building; one along its northern edge and another on its southern wall. Adjacent to the North Storage Building is the South Storage Building and the Sampling Area, where container sampling was conducted. Adjacent to the Sampling Area is the drum pumping area, used for transferring liquid from drums to tanker trucks. West Storage Building #1 (West #1) is located adjacent to Tank Farm Q, and is separated into two compartments. A lab pack consolidation area is located within the West Storage Building #2. The lab pack area is equipped with an adjacent 23,000 cubic feet per minute (cfm) vapor scrubber unit that is designed to remove organic and inorganic contaminants from the air. Three 20,000-gallon sewer discharge batch tanks are just north of this building. They held water to be tested and discharged to the Palo Alto Regional Water Quality Control Plant

The non-hazardous waste areas that will be subsequently demolished are as follows:

Office and Laboratory Buildings – The office buildings and a laboratory are located in the entry area of the facility. The largest of these structures is an office building adjacent to the main driveway (Office Building # 2). Office Building #2 has been used for administrative and support functions, but is currently largely unoccupied. A second office building is at the north end of the driveway (Office Building #1). Office Building #1 was used for operations management, administrative, and support functions. A laboratory (Office/Lab Building #3) is also located in this area, west of Office Buildings #1 and #2. There is a temporary structure used as portable offices southwest of the laboratory. The vehicle maintenance building in the southwest area of the facility houses maintenance, engineering, and transportation services.

Support Areas, Access and Parking – The building at the southwest corner of the property provides housing for truck maintenance, plant maintenance and engineering. A truck wash is located adjacent to the rainwater holding tank, near the southerly site boundary. The Romic facility has a narrow driveway that extends to Bay Road and provides vehicular access to the site.

Decontamination
All equipment will be decontaminated before it is considered for resale, scrap or disposal as waste. The decontamination must meet the approved decontamination criterion. The scope of decontamination is to conduct wet decontamination work in-place and within the confines of the secondary containment area, including all areas of overspray. Structural fixtures will be dismantled and decontaminated within the confines of secondary containment. All decontamination work and verification of decontamination will be concluded prior to equipment removal.

Disassembly
Disassembly of any equipment system will be conducted only after it has been decontaminated and verified as decontaminated. Disassembly set up considerations will include an initial check of equipment interior and exterior sections to ascertain safe and most effective decontamination approach. The disassembly of tanks and associated components will be conducted using an overhead crane to support and lift equipment from the tank or supporting pad.

Demolition
Demolition will follow disassembly and after limited decontamination of equipment systems it is designated as waste.

The demolition of tanks and any associated components not suitable as scrap will be conducted using mechanical shears or similar device to crush, sheer or render the tank into a form acceptable by the designated landfill. An overhead crane or track hoe will be used to lift broken down equipment and set it directly onto a highway transport unit or bulk waste container

Disassembly and Demolition will require application of dust and vapor suppression as well as standard health and safety protocols for the protection of the industrial worker and the surrounding environment.

Transportation of framework to the designated off site location will be consistent with all applicable 49CFR transportation requirements for general bulk commodities and non-hazardous waste.

The project is expected to commence in October 2008 and is expected to take no longer than 12 months to complete the closure plan activities.

Finding of Significant Effect on Environment: *(An Initial Study supporting this finding is attached.)*

On the basis of the information presented in the attached Initial Study, I find that the proposed project could not have a significant effect on the environment.

Mitigation Measures:

DTSC has determined that the project does not require any mitigation measures beyond those incorporated as part of the project description.

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Unit Supervisor Signature

8/20/08
Date

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